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September 1, 2020

Via ECF and

Email Jessica.Vogele@nyed.uscourts.gov

Hon. Steven M. Gold,
United States Magistrate-Judge
U.S. District Court, EDNY
225 Cadman Plaza E
Brooklyn, N.Y. 11201

**Re: United States v. Dzenan Camovic
Criminal No. 20-CR-326 (RPK)**

Dear Judge Gold:

This letter is in response to the government's submission to Judge Kovner dated August 26, 2020 and assigned to Your Honor, seeking pre-trial detention for Mr. Camovic based both on risk of flight and dangerousness to the community. This matter is scheduled to be heard on Thursday, September 3 at 11:30 a.m. via video conference.

In its nine-page public filing, the government goes into great detail as to the alleged evidence that it claims supports its contention that Mr. Camovic's actions were motivated by his support for violent Islamist extremism.

Since this case is in the early stages, we have only received very limited discovery from the state charges previously filed in Kings County. No discovery has been provided as to the government's allegations and conclusions drawn therefrom in its August 26th letter. Thus, we are not in the position to address each allegation line by line. We do however, question the assumptions made based upon a young man's reading and listening to articles and lectures by public figures and the intent or motive drawn therefrom. We also challenge the alleged statement to the hospital worker when our client was under the influence of pain medications and psychotropic drugs due to the hallucinations he was

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suffering from after being shot at least ten (10) times requiring several operations as reflected in the medical records we have been able to review.

Whether Mr. Camovic was motivated by some misguided radical belief, or is simply a very young troubled man who has untreated mental health issues, is yet to be determined. However, given the concurrent state charges, the seriousness of the federal charges and his immigration status, we do not object to pre-trial detention with the opportunity provided under Title 18 U.S.C. Section 3142(f)(2)(B) to present a future bail application based upon information not known at this time as the discovery process ensues.

Respectfully submitted,

s/ Robert G. Stahl

Robert G. Stahl, Esq.

cc: Clerk of Court (by ECF)
AUSA Josh Hafetz (via email & ECF)
AUSA Craig R. Heeren (via email & ECF)
AUSA Artie McConnell (via email & ECF)